DRAFT CAAPP PERMIT
September 21, 2006

217/782-2113

RENEWAL
CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE:

Bridgeview Aerosol, LLC
Attn: Edward S. Piszynski, Vice –President, Laboratory Services
8407 South 77th Avenue
Bridgeview, Illinois 60455

I.D. No.: 031027AAX
Application No.: 96030192

Date Received: March 10, 2005
Date Issued: To be determined
Expiration Date[1]: To be determined

Operation of: Bridgeview Aerosol, LLC, Aerosol Can Filling
Source Location: 8407 South 77th Avenue, Bridgeview, Cook County, 60455
Responsible Official: Edward S. Piszynski, Vice-President, Laboratory Services

This permit is hereby granted to the above-designated Permittee to OPERATE a chemical preparation and aerosol can filling source, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Ross Cooper at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:RWC:psj

cc: Illinois EPA, FOS, Region 1
CES
Lotus Notes

[1] Except as provided in Conditions 1.5 and 8.7 of this permit.

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## 1.0 INTRODUCTION

### 1.1 Source Identification

Bridgeview Aerosol, LLC
8407 South 77th Avenue
Bridgeview, Illinois 60455
708/598-7100

I.D. No.: 031027AAX
County: Cook
Standard Industrial Classification: 7389, Chemical Preparations

### 1.2 Owner/Parent Company

Bridgeview Aerosol, LLC
8407 South 77th Avenue
Bridgeview, Illinois 60455

### 1.3 Operator

Bridgeview Aerosol, LLC
8407 South 77th Avenue
Bridgeview, Illinois 60455

Edward S. Piszynski, Vice –President, Laboratory Services
708/598-7100

### 1.4 Source Description

The source is a manufacturer of consumer aerosol products. In addition, the source includes paint and chemical compounding operations, aerosol can filling lines and associated booster pumps, storage tanks, and boilers for steam production.

Note: This narrative description is for informational purposes only and is not enforceable.

### 1.5 Title I Conditions

As generally identified below, this CAAPP permit contains certain conditions for emission units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations thereunder. These programs include PSD and MSSCAM, and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of the Illinois Environmental Protection Act (Act). These conditions continue in effect, notwithstanding the expiration date specified on the first page of this permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.7.)

a. This permit contains Title I conditions that reflect Title I requirements established in permits previously issued for this source, which conditions are specifically designated as "T1."

## 2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

| | |
|---|---|
| ACMA | Alternative Compliance Market Account |
| Act | Illinois Environmental Protection Act [415 ILCS 5/1 et seq.] |
| AP-42 | Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711 |
| ATU | Allotment Trading Unit |
| BACT | Best Available Control Technology |
| BAT | Best Available Technology |
| CAA | Clean Air Act [42 U.S.C. Section 7401 et seq.] |
| CAAPP | Clean Air Act Permit Program |
| CAM | Compliance Assurance Monitoring |
| CEMS | Continuous Emission Monitoring System |
| CFR | Code of Federal Regulations |
| CO | Carbon Monoxide |
| ERMS | Emissions Reduction Market System |
| HAP | Hazardous Air Pollutant |
| IAC | Illinois Administrative Code |
| I.D. No. | Identification Number of Source, assigned by Illinois EPA |
| ILCS | Illinois Compiled Statutes |
| Illinois EPA | Illinois Environmental Protection Agency |
| LAER | Lowest Achievable Emission Rate |
| MACT | Maximum Achievable Control Technology |
| MSSCAM | Major Stationary Sources Construction and Modification (35 IAC 203, New Source Review for non-attainment areas) |
| NESHAP | National Emission Standards for Hazardous Air Pollutants |
| $NO_x$ | Nitrogen Oxides |
| NSPS | New Source Performance Standards |
| PM | Particulate Matter |
| $PM_{10}$ | Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods |
| $PM_{2.5}$ | Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods |
| PSD | Prevention of Significant Deterioration (40 CFR 52.21, New Source Review for attainment areas) |
| RMP | Risk Management Plan |
| $SO_2$ | Sulfur Dioxide |
| T1 | Title I – identifies Title I conditions that have been carried over from an existing permit |
| T1N | Title I New – identifies Title I conditions that are being established in this permit |
| T1R | Title I Revised – identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit |
| USEPA | United States Environmental Protection Agency |
| VOM | Volatile Organic Material |

## 3.0 CONDITIONS FOR INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

Aboveground storage tanks

Underground mixing tanks

Liquid filling lines used for non-aerosol product filling

3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

Waterbath and conveyor fans

3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b). Note: These activities are not required to be individually listed.

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.3.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322 (see Attachment 2) and 35 IAC Part 266. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.2 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 218.301, which requires that organic material emissions not exceed 8.0 pounds per hour or, if no odor nuisance exists, do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.2.3 For each open burning activity, the Permittee shall comply with 35 IAC Part 237, including the requirement to obtain a permit for open burning in accordance with 35 IAC 237.201, if necessary.

3.2.4 For each storage tank that has a storage capacity greater than 946 liters (250 gallons) and, if no odor nuisance exists, that stores an organic material with a vapor pressure exceeding 2.5 psia at 70°F, the Permittee shall comply with the applicable requirements of 35 IAC 218.122, which requires use of a permanent submerged loading pipe, submerged fill, or a vapor recovery system.

3.3 Addition of Insignificant Activities

3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

## 4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

| Emission Unit | Description | Date Constructed | Emission Control Equipment |
|---|---|---|---|
| AFL-1 | TTV* fill (Nalbach Liquid filler LF-1 and Nalbach Propellant filler PF-1) | 1966 | None |
| AFL-2 | TTV* fill (Nalbach Liquid filler LF-2 and Nalbach Propellant filler PF-2) | 1966 | None |
| AFL-3 | Enhanced UTC/TTV* fill (Kartridge Pak Liquid filler LF-3, Kartridge Pak Propellant filler PF-3 and Aerofill zero emission Booster pump BP-3-1) | 1973 | Vapor recovery unit VR-1 |
| AFL-4 | Enhanced UTC/TTV* fill (Kartridge Pak Liquid fillers LF-4-1 and LF-4-2, Kartridge Pak Propellant fillers PF-4-1 and PF-4-2, Wheatley Booster pump BP-4-1 and Aerofill zero emission Booster pump BP-4-3) | 1988 | Vapor recovery unit VR-1 |
| AFL-5 | Enhanced UTC* fill (MRM Elgin Liquid filler LF-5-1 and Kartridge Pak Liquid filler LF-5-2, Kartridge Pak Propellant filler PF-5 and Wheatley Booster Pump BP-4-2) | 2000 | Vapor recovery unit VR-1 |
| AFL-6 | Enhanced UTC* fill (Kartridge Pak Liquid fillers LF-6-1 and LF-6-2, Kartridge Pak Propellant fillers PF-6 and Aerofill zero emission Booster pump BP-6-1) | 1989 | Vapor recovery unit VR-1 |
| Building 6 | Mixing Tanks K-01, K-02, K-03, K-09 and K-10<br>Sand Mill<br>K-D Mill<br>8 Drum Mixing Stations<br>4 Bin/Tank Mixing Stations | K-01 1978<br>K-02 1978<br>K-03 1978<br>K-09 1981<br>K-10 1984<br>Drum Mixing 1978<br>Bin Mixing 1978 | Dust Collector DC-1 |

| Emission Unit | Description | Date Constructed | Emission Control Equipment |
|---|---|---|---|
| Building 223 | Mixing Tanks K-12, K-13, K-14, K-15, K-16, K-17 and K-18<br>100 Gal. Tran. Tank | K-12 & K-13 1988<br>K-14 & K-15 1988<br>K-16 & K-17 1991<br>K-18 1997<br>Tran. Tank 1991 | None |
| Tank N-47 | 10,500 gallon aboveground solvent (dichloromethane) storage tank | 1998 | Permanent submerged loading pipe |
| Boiler 4 | 4.5 mmBtu/hr natural gas fired boiler | 1997 | None |

* TTC – through the valve
UTC – under the cup

## 5.0 OVERALL SOURCE CONDITIONS

### 5.1 Applicability of Clean Air Act Permit Program (CAAPP)

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.

### 5.2 Area Designation

This permit is issued based on the source being located in an area that, as of the date of permit issuance, is designated nonattainment for the National Ambient Air Quality Standards for ozone (moderate nonattainment) and/or $PM_{2.5}$ and attainment or unclassifiable for all other criteria pollutants (CO, lead, $NO_2$, ozone, $PM_{2.5}$, $PM_{10}$, $SO_2$).

### 5.3 Source-Wide Applicable Provisions and Regulations

5.3.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions for Specific Emission Units) of this permit.

5.3.2 In addition, emission units at this source are subject to the following regulations of general applicability:

a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

b. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

5.3.3 Fugitive Particulate Matter Operating Program

a. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)]. The Permittee shall comply with the fugitive particulate matter operating program, submitted to the Illinois EPA and incorporated by reference into this permit, and any amendments to the program submitted pursuant to paragraph b below.

b. The operating program shall be amended from time to time by the Permittee so that the operating program is current.

Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].

c. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

5.3.4 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.3.5 Risk Management Plan (RMP)

a. This stationary source, as defined in 40 CFR 68.3, is subject to 40 CFR Part 68, the federal regulations for Chemical Accident Prevention. This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(1).

b. The owner or operator of a stationary source shall revise and update the RMP submitted pursuant to 40 CFR 68.150, as specified in 40 CFR 68.190.

5.3.6 Future Emission Standards

a. Should this stationary source become subject to a new or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 9.8. This permit

may also have to be revised or reopened to address such new or revised regulations (see Condition 9.12.2).

b. This permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

5.4 Source-Wide Non-Applicability of Regulations of Concern

Source-wide non-applicability of regulations of concern are not set for this source. However, there are source-wide production and emission limitations set forth in Section 7 of this permit.

5.5 Source-Wide Control Requirements and Work Practices

Source-wide control requirements and work practices are not set for this source. However, there are source-wide production and emission limitations set forth in Section 7 of this permit.

5.6 Source-Wide Production and Emission Limitations

5.6.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.6.1) are set for the purpose of establishing fees and are not federally enforceable (see Section 39.5(18) of the Act).

Permitted Emissions of Regulated Pollutants

| Pollutant | Tons/Year |
|---|---|
| Volatile Organic Material (VOM) | 85.39 |
| Sulfur Dioxide ($SO_2$) | --- |
| Particulate Matter (PM) | 0.29 |
| Nitrogen Oxides ($NO_x$) | 1.97 |
| HAP, not included in VOM or PM | 3.63 |
| Total | 91.28 |

5.6.2 Emissions of Hazardous Air Pollutants

Pursuant to Section 39.5(7)(a) of the Act, the emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). This condition is being imposed so that the source is not a major source of HAP emissions. The Permittee shall fulfill the applicable testing, recordkeeping, and reporting requirements of Conditions 5.7.2, 5.9.2, and 5.10.2.

5.6.3 Other Source-Wide Production and Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to the federal rules for PSD, state rules for MSSCAM, or Section 502(b)(10) of the CAA. However, there are unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.7 Source-Wide Testing Requirements

5.7.1 Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

a. Testing by Owner or Operator: The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].

b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary [35 IAC 201.282(b)].

c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.7.2 HAP Testing to Verify Minor Source Status

Pursuant to Condition 5.7.1 and to verify compliance with the requirements of Condition 5.6.2, that is that this source is not a major source of HAPs, the following testing requirements are established:

a. If in the previous calendar year, emissions of HAPs exceeded 80% of major source threshold for individual or total HAPs (greater than 8 tons of a single HAP or greater than 20 tons of total HAPs), then testing for HAPs using USEPA Method 18, 25(a), or another prior approved testing methodology shall be conducted as follows:

   Test the material(s) or operations(s) that contribute to individual and total HAP emissions.

b. Testing may be conducted by the supplier of the HAP-containing material.

c. The calculation as to whether the 80% of major source threshold was exceeded shall be based on records and procedures in Condition 5.9.2 and shall be completed by January 31 for the previous calendar year. If testing is required it shall be completed by March 15.

d. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.8 Source-Wide Monitoring Requirements

Source-wide monitoring requirements are not set for this source. However, there are provisions for unit specific monitoring set forth in Section 7 of this permit.

5.9 Source-Wide Recordkeeping Requirements

5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act.

5.9.2 Records for HAP Emissions

a. The Permittee shall maintain records of individual and combined HAP emissions on a monthly and annual basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.2, pursuant to Section 39.5(7)(b) of the Act.

b. If testing is required by Condition 5.7.2, the Permittee shall keep records of the testing, including the test date, conditions, methodologies, calculations, test results, and any discrepancies between the test results and formulation specifications of Condition 5.9.2(c) below.

c. The Permittee shall keep a record showing the formulation of each material, including content of all HAPs. These records may be used to make the calculation of HAP emissions required by Condition 5.7.2. If the formulation sheet uses a maximum or range value (e.g., less than 1% or range of 2 – 3%) then the highest value shall be used.

5.9.3 Retention and Availability of Records

a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.10 Source-Wide Reporting Requirements

5.10.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the source with the permit requirements within 30 days, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.

5.10.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information, including HAP emissions, for the previous calendar year.

5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios

Source-wide operational flexibility is not set for this source. However, there are provisions for unit specific operational flexibility set forth in Section 7 of this permit.

## 5.12 Source-Wide Compliance Procedures

### 5.12.1 Procedures for Calculating Emissions

Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be addressed by the testing, recordkeeping and reporting requirements of Conditions 5.7, 5.9 and 5.10, and compliance procedures in Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit.

## 6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS

### 6.1 Emissions Reduction Market System (ERMS)

#### 6.1.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source should have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

#### 6.1.2 Applicability

Emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year shall not

exceed 15 tons, not including VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit. This limitation is established at the request of the source to exempt it from the requirements of 35 IAC Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 IAC 205.205.

6.1.3 Recordkeeping and Reporting

a. The Permittee shall maintain the following records to determine compliance with the above limitation:

i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;

ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit; and

iii. Total VOM emissions from the source, in tons, during each seasonal allotment period.

b. The Permittee shall submit the seasonal emissions component of the Annual Emissions Report by November 30 of each year, reporting actual emissions of VOM during the seasonal allotment period, in accordance with 35 IAC 205.205(b) and 35 IAC 205.300.

c. In the event that the source's VOM emissions during the seasonal allotment period exceed 15 tons, the source shall no longer be exempt from the ERMS and shall immediately comply with 35 IAC Part 205, including holding allotment trading units (ATUs) for its VOM emissions during the first seasonal allotment period it exceeded 15 tons and each seasonal allotment period thereafter, pursuant to 35 IAC Section 205.150(c).

## 7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

### 7.1 Aerosol Can Filling Lines

#### 7.1.1 Description

The Permittee operates six aerosol can filling lines that fill aerosol cans by either the through-the-valve method (TTV) or the enhanced under-the-cup (UTC) method with vapor recovery.

Note: This narrative description is for informational purposes only and is not enforceable.

#### 7.1.2 List of Emission Units and Air Pollution Control Equipment

| Emission Unit | Description | Date Constructed | Emission Control Equipment |
|---|---|---|---|
| AFL-1 | TTV* fill (Nalbach Liquid filler LF-1 and Nalbach Propellant filler PF-1) | 1966 | None |
| AFL-2 | TTV* fill (Nalbach Liquid filler LF-2 and Nalbach Propellant filler PF-2) | 1966 | None |
| AFL-3 | Enhanced UTC* fill (Kartridge Pak Liquid filler LF-3, Kartridge Pak Propellant filler PF-3 and Aerofill zero emission Booster pump BP-3-1) | 1973 | Vapor recovery unit VR-1 |
| AFL-4 | TTV* and Enhanced UTC* fill (Kartridge Pak Liquid fillers LF-4-1 and LF-4-2, Kartridge Pak Propellant fillers PF-4-1 and PF-4-2, Wheatley Booster pump BP-4-1 and Aerofill zero emission Booster pump BP-4-3) | 1988 | Vapor recovery unit VR-1 |

| Emission Unit | Description | Date Constructed | Emission Control Equipment |
|---|---|---|---|
| AFL-5 | Enhanced UTC* fill (MRM Elgin Liquid filler LF-5-1 and Kartridge Pak Liquid filler LF-5-2, Kartridge Pak Propellant filler PF-5 and Wheatley Booster Pump BP-4-2) | 2000 | Vapor recovery unit VR-1 |
| AFL-6 | Enhanced UTC* fill (Kartridge Pak Liquid fillers LF-6-1 and LF-6-2, Kartridge Pak Propellant fillers PF-6 and Aerofill zero emission Booster pump BP-6-1) | 1989 | Vapor recovery unit VR-1 |

* TTV: Through-the-Valve
UTC: Under-the-Cup

7.1.3 Applicable Provisions and Regulations

a. The "affected aerosol can filling lines" for the purpose of these unit-specific conditions, are aerosol can filling lines described in Conditions 7.1.1 and 7.1.2.

b. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, with the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material.

Note: Photochemically reactive material is defined in 35 IAC 211.4690.

Note: Work practices for the affected aerosol can filling lines pursuant to 35 IAC 218.686 are found in 7.1.5. Recordkeeping requirements for the aerosol can filling lines pursuant to 35 IAC 218.692 are found in 7.1.9.

7.1.4 Non-Applicability of Regulations of Concern

a. The affected aerosol can filling lines are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected aerosol can

filling lines do not use an add-on control device to achieve compliance with an emission limitation or standard.

Note: The aerosol can filling lines do utilize a vapor recovery unit (VR-1), however the vapor recovery unit's use is to reclaim material for re-use and cost reductions, not to achieve compliance with an emission limitation or standard. Compliance with 35 IAC 218.686 is inherent in the process of utilizing through-the-valve fill or enhanced under-the-cup fill methods as optionally provided by 35 IAC 218.686(a)(2)(A).

7.1.5 Control Requirements and Work Practices

a. The Permittee shall follow good operating practices for the affected aerosol can filling lines and vapor recovery unit, including periodic inspection (i.e., monthly), routine maintenance and prompt repair of defects (i.e., within 15 days).

b. Pursuant to 35 IAC 218.686(a), every owner or operator of an aerosol can filling line that is filling cans with a propellant which contains propane, butane or other VOM shall comply with the following requirements:

i. As an alternative to compliance with 35 IAC 218.686(a)(1), the owner or operator of an aerosol can filing line shall comply with the following requirements:

A. Fill all cans, other than trial runs of cans to verify product quality, using through-the-valve fill or enhanced under-the-cup fill to minimize loss of VOM propellant, pursuant to 35 IAC 218.686(a)(2)(A).

B. Verify proper filling of cans with a VOM monitoring system in the gas house. This system may monitor VOM concentration as a percentage of the lower explosive limit, pursuant to 35 IAC 218.686(a)(2)(C).

c. Every owner or operator of a propellant booster pump associated with an aerosol can filling line subject to this Subpart shall comply with the following requirements:

i. Work practices to prevent leaks from a pump, meaning a loss of VOM from the pump above background levels. Work practices shall include changing seals every four (4) weeks and plungers every 16 weeks unless a pump monitoring procedure approved in a federally enforceable permit establishes otherwise, pursuant to 35 IAC 218.686(b)(2).

Note: At this time, the owner or operator does not have a federally enforceable permit establishing another pump monitoring procedure.

d. The affected aerosol can filling lines shall not be operated unless the vapor recovery system is in proper working order and is in operation.

7.1.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected aerosol can filling lines are subject to the following:

a. i. Emissions from the affected aerosol can filling lines (i.e., liquid fillers (LF), propellant fillers (PF) and booster pumps (BP)) shall not exceed the following limits:

| Emission Unit | Operating Hours (Hr/Yr) | VOM Emissions (Lb/Hr) | VOM Emissions (Ton/Yr) |
|---|---|---|---|
| LF-1 | 8,736 | 0.09 | 0.39 |
| LF-2 | 8,736 | 0.09 | 0.39 |
| LF-3 | 8,736 | 0.10 | 0.44 |
| LF-4-1 | 8,736 | 0.05 | 0.22 |
| LF-4-2 | 8,736 | 0.05 | 0.22 |
| LF-6-1 | 8,736 | 0.05 | 0.22 |
| LF-6-2 | 8,736 | 0.05 | 0.22 |
| PF-1 | 8,736 | 0.07 | 0.31 |
| PF-2 | 8,736 | 0.07 | 0.31 |
| PF-3 | 8,736 | 1.48 | 6.46 |
| PF-4-1 | 8,736 | 1.48 | 6.46 |
| PF-4-2 | 8,736 | 0.10 | 0.44 |
| PF-6 | 8,736 | 0.59 | 2.58 |
| BP-3 | 8,736 | 1.50 | 6.55 |
| BP-4-1 | 8,736 | 1.50 | 6.55 |
| BP-4-2 | 8,736 | 1.50 | 6.55 |
| BP-6 | 8,736 | 1.50 | 6.55 |
| LF-5-1 | 6,600 | 0.05 | 0.17 |
| LF-5-2 | 6,600 | 0.05 | 0.22 |
| PF-5 | 6,600 | 0.58 | 1.91 |
| | | Total | 47.16 |

These limits are based on the operating hours and maximum emission rates made in permit application. Compliance with annual limit shall be determined from a running total of 12 months of data.

ii. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the

current month plus the preceding 11 months (running 12 month total) [T1].

iii. The above limitations were established in Permits 92080005 and 00070077, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

b. i. Production of VOC propelled cans shall not exceed the following limits:

| Number of Cans Filled Aerosol Filling Lines 1-4, & 6 (Cans/Yr) |
|---|
| 88,000,000 |

These limits are based on the operating hours and maximum emission rates made in permit application. Compliance with annual limit shall be determined from a running total of 12 months of data.

The above limitations were established in Permit 92080005, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

ii. Production of VOC propelled cans shall not exceed the following limits:

| Number of Cans Filled Aerosol Filling Line 5 (Cans/Yr) |
|---|
| 22,000,000 |

These limits are based on the operating hours and maximum emission rates made in permit application. Compliance with annual limit shall be determined from a running total of 12 months of data.

The above limitations were established in Permit 00070077, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.1.7 Testing Requirements

a. When in the opinion of the Agency it is necessary to conduct testing to demonstrate compliance or verify effectiveness with 35 IAC 218.686, the owner or operator of a VOM emission unit subject to the requirements of 35 IAC 218 Subpart DD shall, at its own expense, conduct such tests in accordance with the applicable test methods and procedures specified in 35 IAC 218.105, pursuant to 35 IAC 218.688.

7.1.8 Monitoring Requirements

a. Every owner or operator of an aerosol can filling line shall verify proper filling of cans with a VOM monitoring system in the gas house. This system may monitor VOM concentration as a percentage of the lower explosive limit, pursuant to 35 IAC 218.686(a)(2)(C).

b. Every owner or operator of a propellant booster pump associated with an aerosol can filling line subject to this Subpart shall comply with the following requirements:

i. Work practices to prevent leaks from a pump, meaning a loss of VOM from the pump above background levels. Work practices shall include changing seals every four (4) weeks and plungers every 16 weeks unless a pump monitoring procedure approved in a federally enforceable permit establishes otherwise, pursuant to 35 IAC 218.686(b)(2).

Note: At this time, the owner or operator does not have a federally enforceable permit establishing another pump monitoring procedure.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected aerosol can filling lines to demonstrate compliance with Conditions 5.6.1 and 7.1.5 and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

a. i. Pursuant to 35 IAC 218.692(b):

Any owner or operator of an aerosol can filling line which is subject to the requirements of Subpart DD and complying by means of the methods of filling cans including use of a reclamation system shall comply with the following:

A. Not applicable.

B. On and after a date consistent with 35 IAC 218.106 or on and after the initial start-up date, the owner or operator of a subject line shall collect and record the following information for each type of product that is not filled by the through-the-valve method. Information need be provided pursuant only to 35 IAC 218.692(b)(1) (B), (C), (D) and (E) below to the extent that the information is relied upon by the owner or operator to demonstrate that a product is not capable of being filled by through-the-valve method. For this purpose, each formulation in a particular type of can with a particular type of valve assembly shall be addressed separately as a unique product considering the range of models of cans and valve assemblies, e.g., suppliers, sizes and weights of the type used for such product:

1. Identifying information for the product type, including identification and description of the cans' contents, type and model of cans, type and models of valve assembly, and type of propellant and nominal propellant charge.

2. Whether the valve assembly is able to be through-the-valve filled.

3. Under-the-cup operating rate and projected through-the-valve fill operating rate.

4. Information addressing the impact of through-the-valve fill on performance.

5. Other supporting data.

6. Whether the product is deemed capable of being filled by the through-the-valve method.

C. On and after a date consistent with 35 IAC 218.106 or on and after the initial start-up date, the owner or operator of a subject line shall collect and record all of the following information each day for each line and maintain the information at the source for a period of three years:

1. Operating data for the line and fill systems.

2. For a reclamation system, system monitoring data.

3. Number of cans filled which are capable of being filled by means of through-the-valve fill, determined in accordance with the records kept pursuant to 35 IAC 218.692(b)(2), condition 7.1.9(a)(i)(II) above, and percentage of such cans actually filled using through-the-valve fill.

ii. Pursuant to 35 IAC 218.692(c):

Any owner or operator of a propellant booster pump which is subject to the requirements of 35 IAC 218 Subpart DD and complying by means of work practices, shall comply with the following:

A. Not applicable.

B. On and after the date consistent with 35 IAC 218.106, or on and after the initial start-up date, the owner or operator of a subject pump shall collect and record all of the following information each day for each pump and maintain the information at the source for a period of three years:

1. Operating data for each pump, including date and time a leak in a pump is detected, date and time a leaking pump is removed from service and action taken to repair a pump.

2. A maintenance log for the pump, detailing all routine and non-routine maintenance performed including dates and duration of any outages.

b. i. Total number of cans filled by the through-the-valve method, cans/mo and cans/yr.

ii. Total number of cans filled by the enhanced under-the-cup method, cans/mo and cans/yr.

iii. Operating hours, hr/mo and hr/yr.

iv. VOM and HAP emissions with supporting calculations based from the record keeping as required by this condition, tons/mo and tons/yr.

v. The Permittee shall keep onsite records of the results of periodic inspections, routine maintenance, and repair of defects.

vi. Appropriate records from the VOM monitoring system in the gas house.

vii. Appropriate records for the work practices to prevent leaks from a pump.

7.1.10 Reporting Requirements

a. Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected aerosol can filling lines with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

i. Emissions of VOM from the affected aerosol can filling lines in excess of the limits specified in Conditions 7.1.3(e), and 7.1.6 within 30 days of such occurrence.

ii. Operation of the affected aerosol can filling lines in excess of the limits specified in Condition 7.1.6 within 30 days of such occurrence.

b. Pursuant to 35 IAC 218.692(b)(4):

On and after the date consistent with 35 IAC 218.106, the owner or operator of a subject line shall notify the Agency:

i. Of a violation of the requirements of 35 IAC 218 Subpart DD by sending a copy of any record showing the violation to the Agency within 30 days following the calendar quarter in which the violation occurred.

ii. At least 30 calendar days before changing the method of compliance with 35 IAC 218 Subpart DD, from the methods of filling cans to the use of capture systems and control devices, the owner or operator shall comply with all requirements of 35 IAC 218.692(a)(1). Upon changing the method of compliance, the owner or operator shall comply with all requirements of subsection 35 IAC 218.692(a).

c. Pursuant to 35 IAC 218.692(c)(3):

On and after a date consistent with 35 IAC 218.106, the owner or operator of a subject pump shall notify the Agency:

i. Of a violation of the requirements of 35 IAC 218 Subpart DD by sending a copy of any record showing

the violation to the Agency within 30 days following the occurrence of the violation;

ii. At least 30 calendar days before changing the method of compliance with 35 IAC 218 Subpart DD from work practices to use of emission capture and control equipment, the owner or operator shall submit a revised certification pursuant to 35 IAC 218.692(a)(1). Upon changing the method of compliance with 35 IAC 218 Subpart DD, the owner or operator shall comply with all applicable requirements of 35 IAC 218.692(a).

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected aerosol can filling lines.

7.1.12 Compliance Procedures

a. Compliance with Condition 7.1.3(b) is addressed by the records and reporting required in Condition 7.1.9 and the emissions calculation procedure that:

The non-photochemical reactivity of VOM emissions from each affected aerosol can filling lines shall be demonstrated through the use of VOM-containing materials whose volumetric portion of VOM within the material does not exceed the volumetric percentage thresholds which would render their VOM emissions photochemically reactive, pursuant to 35 IAC 211.4690.

b. Compliance with Conditions 7.1.5(b), (c), and (d), is addressed by the records and reporting required in Condition 7.1.9(b).

c. Compliance with the emission limits in Condition 5.6 and 7.1.6(a) is addressed by the records and reporting required in Condition 7.1.9(a) and (b) and the emission factors and formulas listed below:

i. Emission factors for the affected aerosol can filling lines (i.e., liquid fillers (LF), propellant fillers (PF) and booster pumps (BP)):

| Emission Unit | VOM Emission Factor | |
|---|---|---|
| LF-1 | 0.0785 | Lb VOM/hr |
| PF-1 | $3.5 \times 10^{-5}$ | Lb VOM/can |
| LF-2 | 0.0785 | Lb VOM/hr |
| PF-2 | $3.5 \times 10^{-5}$ | Lb VOM/can |
| LF-3 | 0.0698 | Lb VOM/hr |
| PF-3 | $3.39 \times 10^{-3}$ | Lb VOM/can |
| BP-3 | 1.0 | Lb VOM/hr |

| Emission Unit | VOM Emission Factor | |
|---|---|---|
| LF-4-1 | 0.0235 | Lb VOM/hr |
| PF-4-1 | $3.39 \times 10^{-3}$ | Lb VOM/can |
| BP-4-1 | 1.0 | Lb VOM/hr |
| LF-4-2 | 0.0236 | Lb VOM/hr |
| PF-4-2 | $2.34 \times 10^{-5}$ | Lb VOM/can |
| BP-4-2 | 1.0 | Lb VOM/hr |
| LF-5-1 | 0.05 | Lb VOM/hr |
| LF-5-2 | 0.05 | Lb VOM/hr |
| PF-5 | $1.75 \times 10^{-3}$ | Lb VOM/can |
| LF-6-1 | 0.0260 | Lb VOM/hr |
| LF-6-2 | 0.0236 | Lb VOM/hr |
| PF-6 | $1.75 \times 10^{-3}$ | Lb VOM/can |
| BP-6 | 1.0 | Lb VOM/hr |

The emission factors sources as detailed in the application are:

Liquid Filling: EPA Doc 450/3-86-002 (Fugitive Emission Factors)
Propellant Filling: Documents authored by Kartridge Pak and other industry sources
Propellant Booster: Manufacture’s ratings

## 7.2 Compounding Process

### 7.2.1 Description

Paint and non-paint compounding are being performed in the mixing tanks. Chemical raw materials are mixed and blended to produce intermediates for aerosol and non-aerosol can filling.

Note: This narrative description is for informational purposes only and is not enforceable.

### 7.2.2 List of Emission Units and Air Pollution Control Equipment

| Emission Unit | Description | Date Constructed | Emission Control Equipment |
|---|---|---|---|
| Building 6 | Mixing Tanks K-01, K-02, K-03, K-09 and K-10<br>Sand Mill<br>8 Drum Mixing Stations<br>4 Bin/Tank Mixing Stations | K-01 1978<br>K-02 1978<br>K-03 1978<br>K-09 1981<br>K-10 1984<br>Drum Mixing 1978<br>Bin Mixing 1978 | Dust Collector DC-1 |
| Building 223 | Mixing Tanks K-12, K-13, K-14, K-15, K-16, K-17 and K-18<br>100 Gal. Tran. Tank | K-12 & K-13 1988<br>K-14 & K-15 1988<br>K-16 & K-17 1991<br>K-18 1997<br>Tran. Tank 1991 | None |

### 7.2.3 Applicable Provisions and Regulations

a. The "affected compounding processes" for the purpose of these unit-specific conditions, are compounding processes described in Conditions 7.2.1 and 7.2.2.

b. Pursuant to 35 IAC 212.123,

i. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit, other than those emission units subject to 35 IAC 212.122.

ii. The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 1000 ft radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions

permitted from each such emission unit shall be limited to 3 times in any 24 hour period.

c. Pursuant to 35 IAC 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.

d. Pursuant to 35 IAC 212.321, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates determined by using the equation:

$$E = 2.54\ (P)^{0.534}$$

where

P = Process weight rate in T/hr
E = Allowable emission rate in lbs/hr

e. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, with the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material.

Note: Photochemically reactive material is defined in 35 IAC 211.4690.

Note: Work practices for the affected compounding processes pursuant to 35 IAC 218.624-626 and 218.628-630 are found in 7.2.5.

7.2.4 Non-Applicability of Regulations of Concern

a. The affected compounding processes are not subject to the New Source Performance Standards (NSPS) for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry, 40 CFR Part 60, Subpart VV, because the affected compounding processes are by definition not a synthetic organic chemicals manufacturing industry that produces, as intermediates or final products, one or more of the chemicals listed in 40 CFR 60.489.

b. The affected compounding processes are not subject to the National Emission Standards for Organic Hazardous Air

Pollutants (NESHAP) for the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater, 40 CFR Part 63, Subpart G, or the NESHAP for Organic Hazardous Air Pollutants for Equipment Leaks, 40 CFR Part 63, Subpart H, because the affected plant site at which the chemical manufacturing processing unit is located emits, and will continue to emit, during any 12-month period, less than 10 tons per year of any individual hazardous air pollutants (HAP), and less than 25 tons per year of any combination of HAP pursuant to 40 CFR 63.100(b)(4) of the NESHAP for the Synthetic Organic Chemical Manufacturing Industry, 40 CFR Part 63 Subpart F. See Condition 5.6.2.

c. The affected compounding processes are not subject to the National Emission Standards for Organic Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing, 40 CFR Part 63, Subpart FFFF, because the miscellaneous organic chemical manufacturing process units (MCPU) are not located at, or are part of, a major source of hazardous air pollutants (HAP) emissions as defined in section 112(a) of the Clean Air Act (CAA), pursuant to 40 CFR 63.2435(a). See Condition 5.6.2.

d. The affected compounding processes are not subject to the National Emission Standards for Organic Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing, 40 CFR Part 63, Subpart HHHHH, because the miscellaneous coating manufacturing operations are not located at, or are part of, a major source of hazardous air pollutants (HAP) emissions as defined in section 112(a) of the Clean Air Act (CAA), pursuant to 40 CFR 63.7985(a)(1). See Condition 5.6.2.

e. The affected compounding processes are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected compounding processes not use an add-on control device to achieve compliance with an emission limitation or standard, and does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.2.5 Control Requirements and Work Practices

a. The Permittee shall follow good operating practices for the affected compounding processes and dust collector (DC1), including periodic inspection (i.e., monthly), routine maintenance and prompt repair of defects (i.e., within 15 days).

b. Pursuant to 35 IAC 218.624, no person shall operate an open-top mill, tank, vat or vessel with a volume of more

than 45 l (12 gal) for the production of paint or ink unless:

i. The mill, tank, vat or vessel is equipped with a cover which completely covers the mill, tank, vat or vessel opening except for an opening no larger than necessary to allow for safe clearance for a mixer shaft. Such cover shall extend at least 1.27 cm (0.5 in) beyond the outer rim of the opening or be attached to the rim.

ii. The cover remains closed except when production, sampling, maintenance or inspection procedures require access.

iii. The cover is maintained in good condition such that, when in place, it maintains contact with the rim of the opening for at least 90 percent of the circumference of the rim.

c. Pursuant to 35 IAC 218.625:

i. No person shall operate a grinding mill for the production of paint or ink which is not maintained in accordance with the manufacturer's specifications.

ii. No person shall operate a grinding mill fabricated or modified after the effective date of this Subpart which is not equipped with fully enclosed screens.

iii. The manufacturer's specifications shall be kept on file at the plant by the owner or operator of the grinding mill and be made available to any person upon verbal or written request during business hours.

d. Pursuant to 35 IAC 218.626:

i. The owner or operator shall equip tanks storing VOL with a vapor pressure greater than 10 kPa (1.5 psi) at 20°C (68°F) with pressure/vacuum conservation vents set as a minimum at +/-0.2 kPa (0.029 psi). These controls shall be operated at all times. An alternative air pollution control system may be used if it results in a greater emission reduction than these controls. Any alternative control system can be allowed only if approved by the Agency and approved by the USEPA as a SIP revision.

ii. Stationary VOL storage containers with a capacity greater than 946 1 (250 gal) shall be equipped with a submerged-fill pipe or bottom fill. These controls shall be operated at all times. An alternative control system can be allowed only if approved by the Agency and approved by the USEPA as a SIP revision.

e. Pursuant to 35 IAC 218.628, the owner or operator of a paint or ink manufacturing source shall, for the purpose of detecting leaks, conduct an equipment monitoring program as set forth below:

i. Each pump shall be checked by visual inspection each calendar week for indications of leaks, that is, liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, the pump shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected.

ii. Any pump, valve, pressure relief valve, sampling connection, open-ended valve and flange or connector containing a fluid which is at least 10 percent VOM by weight which appears to be leaking on the basis of sight, smell or sound shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected.

iii. A weather proof, readily visible tag, in bright colors such as red or yellow, bearing an identification number and the date on which the leak was detected shall be attached to leaking equipment. The tag may be removed upon repair, that is, when the equipment is adjusted or otherwise altered to allow operation without leaking.

iv. When a leak is detected, the owner or operator shall record the date of detection and repair and the record shall be retained at the source for at least two years from the date of each detection or each repair attempt. The record shall be made available to any person upon verbal or written request during business hours.

f. Pursuant to 35 IAC 218.630:

i. No person shall clean paint or ink manufacturing equipment with organic solvent unless the equipment being cleaned is completely covered or enclosed except for an opening no larger than necessary to allow safe clearance for proper operation of the cleaning equipment, considering the method and materials being used.

ii. No person shall store organic wash solvent in other than closed containers, unless closed containers are demonstrated to be a safety hazard, or dispose of organic wash solvent in a manner such that more than 20 percent by weight is allowed to evaporate into the atmosphere.

7.2.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected compounding processes are subject to the following:

a. i. Emissions from the affected compounding processes shall not exceed the following limits:

| Emission Unit | VOM Emissions (Lb/Hr) | VOM Emissions (T/Yr) |
|---|---|---|
| (1) 3,000 gal Mixing Tank (K-15) | 0.71 | 1.56 |
| (6) 10,000 gal Mixing Tanks (K-12, K-13, K-14, K-16, K-17 & K-18) | 25.58 | 56.28 |

ii. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

iii. The above limitations were established in Permit 78010005, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

b. i. Emissions from the affected compounding processes shall not exceed the following limits:

| Emission Unit | Operating Hours (Hr/Yr) | VOM Emissions (Lb/Hr) | VOM Emissions (Ton/Yr) |
|---|---|---|---|
| 26 Mixing Vessels | 8,736 | 8.60 | 37.56 |

These limits are based on the operating hours and maximum emission rates made in permit application.

ii. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

iii. The above limitations were established in Permit 94060029, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

c. i. Emissions from the affected compounding processes shall not exceed the following limits:

| Emission Unit | Operating Hours (Hr/Yr) | VOM Emissions (Lb/Hr) | VOM Emissions (Ton/Yr) |
|---|---|---|---|
| LF-B7-1 | 2080 | 0.02 | 0.02 |
| LF-B7-5 | 2080 | 0.02 | 0.02 |
| LF-B7-D | 2080 | 0.01 | 0.01 |
| LF-B7-4B | 2080 | 0.04 | 0.05 |

These limits are based on the operating hours and maximum emission rates made in permit application.

ii. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

iii. The above limitations were established in Permit 92080005, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

d. i. This permit is based on negligible emissions of volatile organic material from mixing tank K-18. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.

ii. The above limitations were established in Permit 97040062, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.2.7 Testing Requirements

Testing requirements are not set for the affected compounding processes. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.2.8 Monitoring Requirements

a. Records of the weekly periodic inspections for pump leaks as required by 7.2.5(e).

b. Records of the monthly periodic inspections of the dust collector system as required by 7.2.5(a).

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected compounding processes to demonstrate compliance with Conditions 5.6.1 and 7.2.3, 7.2.5, and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

a. Pursuant to 35 IAC 218.637(b), every owner or operator of a source which is subject to the requirements of this 35 IAC Subpart AA shall maintain all records necessary to demonstrate compliance with those requirements at the source for three years.

b. i. Solvent usage [Solvent purchased + solvent in beginning inventory - solvent in ending inventory], in gal/yr.

ii. Beginning inventory, in gal.

iii. Ending inventory, in gal.

iv. Solvent purchased, in gal.

v. Density of each solvent used, in lb/gal.

vi. MSDS of each solvent and any other VOM containing raw material used.

vii. VOM and HAP emissions with supporting calculations based from the record keeping as required by this condition, tons/mo and tons/yr.

viii. Record indicating compliance with 35 IAC 218.624.

ix. The manufacturer’s specifications for the grinding mills and record indicating compliance with 35 IAC 218.625.

x. Vapor pressure of all VOL in kPa or psi at 68°F or 20°C and MSDS of all VOL stored in the tanks and record indicating compliance with 35 IAC 218.626.

xi. Records indicating an equipment monitoring program for detection of leaks is in place and all the record indicating compliance with 35 IAC 218.628.

xii. Records indicating compliance with 35 IAC 218.630.

xiii. Records of maximum process weight rate (lb/hr).

xiv. The Permittee shall keep onsite records of the results of periodic inspections, routine maintenance, and repair of defects.

7.2.10 Reporting Requirements

a. Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected compounding processes with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

i. Emissions of VOM from the affected compounding processes in excess of the limits specified in Conditions 7.2.3 and 7.2.6 within 30 days of such occurrence.

ii. Operation of the affected compounding processes in excess of the limits specified in Condition and 7.2.5 within 30 days of such occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected compounding processes without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

a. Usage of any solvent, without exceeding the permitted emissions of Conditions 5.6.1 and 7.2.6.

7.2.12 Compliance Procedures

a. Compliance with the PM emission limitations of Conditions 7.2.3(b), (c), and (d) is addressed by the normal work practices and maintenance activities required in Condition 7.2.5(a) and the records required in Condition 7.2.9.

b. Compliance with Condition 7.2.3(e) is addressed by the records required in Condition 7.2.9 and the emissions calculation procedure that:

The non-photochemical reactivity of VOM emissions from each affected compounding processes shall be demonstrated through the use of VOM-containing materials whose volumetric portion of VOM within the material does not exceed the volumetric percentage thresholds which would

render their VOM emissions photochemically reactive, pursuant to 35 IAC 211.4690.

c. Compliance with Conditions 7.2.5(a), (b), (c), (d), (e), and (f) is addressed by the records required in Condition 7.2.9.

d. Compliance with the VOM emission limitations of Conditions 7.2.6(a), (b), (c), and (d) is addressed by the requirements of Conditions 7.2.5(a) and the records required in Condition 7.2.9.

## 7.3 Storage Tank

### 7.3.1 Description

The Permittee utilizes a 10,500 gallon fixed roof aboveground storage tank to store methylene chloride (dichloromethane). A permanent submerged loading is used on this tank, minimizing turbulence and evaporation during loading.

Note: This narrative description is for informational purposes only and is not enforceable.

### 7.3.2 List of Emission Units and Air Pollution Control Equipment

| Emission Unit | Description | Date Constructed | Emission Control Equipment |
|---|---|---|---|
| Tank N-47 | 10,500 gallon aboveground solvent (dichloromethane) storage tank | 1998 | Permanent submerged loading pipe |

### 7.3.3 Applicable Provisions and Regulations

a. The "affected storage tank" for the purpose of these unit-specific conditions, is a storage tank described in Conditions 7.3.1 and 7.3.2.

Note: Work practices for the affected storage tank pursuant to 35 IAC 218.122(b) are found in 7.3.5.

### 7.3.4 Non-Applicability of Regulations of Concern

a. The affected storage tank is not subject to the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR Part 60, Subpart Kb, because the affected storage tank does not have a capacity greater than or equal to 75 cubic meters (m3) (19812.9 gallons) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984, pursuant to 40 CFR 60.110b(a).

b. The affected storage tank is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Storage Vessels (Tanks), 40 CFR Part 63, Subpart WW, because the Subpart WW only applies to those owners and operators of facilities subject to a referencing subpart, pursuant to 40 CFR 63.1060.

c. The affected storage tank is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary

Sources, because the affected storage tank uses a passive control measure, such as a seal, lid, or roof, that is not considered a control device because it acts to prevent the release of pollutants.

7.3.5 Control Requirements and Work Practices

a. The Permittee shall follow good operating practices for the affected storage tank, including periodic inspection(i.e., monthly), routine maintenance and prompt repair of defects (i.e., within 15 days).

b. Pursuant to 35 IAC 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 1 (250 gal), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Agency according to the provisions of 35 IAC 201, and further processed consistent with 35 IAC 218.108, or unless such tank is a pressure tank as described in 35 IAC 218.121(a) or is fitted with a recovery system as described in 35 IAC 218.121(b)(2).

Note: Pursuant to 35 IAC 218.122(c), if no odor nuisance exists the limitations of 35 IAC 218.122(b) shall only apply to the loading of VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F).

7.3.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected storage tank is subject to the following:

a. i. VOM emissions from the affected storage tank shall not exceed 0.63 tons per year. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). These limits were established in Permit 95040014 [T1].

ii. The above limitations were established in Permit 95040014, pursuant to PSD. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for PSD [T1].

7.3.7 Testing Requirements

Testing requirements are not set for the affected storage tank. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.3.8 Monitoring Requirements

Monitoring requirements are not set for the affected storage tank.

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected storage tank to demonstrate compliance with Conditions 5.6.1 and 7.3.6, pursuant to Section 39.5(7)(b) of the Act:

a. i. Design information for the storage tank showing the presence of a permanent submerged loading pipe.

ii. The Permittee shall keep onsite records of the results of periodic inspections, routine maintenance, and repair of defects for the storage tank and submerged loading pipe.

iii. The throughput of each organic liquid through the affected storage tank, gal/mo and gal/year.

iv. VOM and HAP emissions from the storage tank, tons/mo and tons/yr, with supporting calculations based from the record keeping required by this condition, and an approved USEPA methodology, such as the most recent version of the TANKS program.

7.3.10 Reporting Requirements

a. Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected storage tank with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

i. Emissions of VOM from the affected storage tank in excess of the limits specified in Condition 7.3.5 or 7.3.6 within 30 days of such occurrence.

ii. Operation of the affected storage tank in noncompliance of the requirements specified in Condition 7.3.5 within 30 days of such occurrence.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected storage tank.

7.3.12 Compliance Procedures

a. Compliance with the VOM emission limitation of Condition 7.3.6(a) is addressed by the records required in Condition 7.3.9(a).

b. Compliance with Condition 7.3.5(b) is addressed by the use of a submerged loading pipe as required in Condition 7.3.5(b) and the records required in Condition 7.3.9(a)(i).

## 7.4 Boiler

### 7.4.1 Description

A 4.5 mmBtu/hr natural gas fired boiler used for the production of steam, hot water, and space heat.

Note: This narrative description is for informational purposes only and is not enforceable.

### 7.4.2 List of Emission Units and Air Pollution Control Equipment

| Emission Unit | Description | Date Constructed | Emission Control Equipment |
|---|---|---|---|
| Boiler 4 | 4.5 mmBtu/hr natural gas fired boiler | 1997 | None |

### 7.4.3 Applicable Provisions and Regulations

a. The "affected boiler" for the purpose of these unit-specific conditions, is a boiler described in Conditions 7.4.1 and 7.4.2.

b. Pursuant to 35 IAC 212.123,

   i. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit, other than those emission units subject to 35 IAC 212.122.

   ii. The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 1000 ft radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.

c. Pursuant to 35 IAC 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.

7.4.4 Non-Applicability of Regulations of Concern

a. The affected boiler is not subject to the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60, Subpart dc, because the affected boiler does not have a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (Btu/hr)) or less, but greater than or equal to 2.9 MW (10 million Btu/hr), pursuant to 40 CFR 60.40c(a).

b. The affected boiler is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR Part 63, Subpart DDDDD, because the affected boiler is not located at, or is part of, a major source of HAP as defined in 40 CFR 63.2, provided below, pursuant to 40 CFR 63.7485. See Condition 5.6.2.

   40 CFR 63.2: "Major source means any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants, unless the Administrator establishes a lesser quantity, or in the case of radionuclides, different criteria from those specified in this sentence."

c. The affected boiler is not subject to 35 IAC 216.121, because the affected boiler does not have an actual heat input greater than 2.9 MW (10 mmBtu/hr).

d. The affected boiler is not subject to 35 IAC 217.121, because the affected boiler does not have an actual heat input equal to or greater than 73.2 MW (250 mmBtu/hr).

e. The affected boiler is not subject to 35 IAC 218.301, because pursuant to 35 IAC 218.303 the provisions of 35 IAC 218.301 shall not apply to fuel combustion emission units.

f. The affected boiler is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected boiler does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.4.5 Control Requirements and Work Practices

a. The Permittee shall follow good operating practices for the affected boiler, including periodic inspection (i.e., monthly), routine maintenance and prompt repair of defects (i.e., within 15 days).

b. The affected boiler shall only be fired with natural gas as the fuel, at a firing rate not to exceed 4.5 mmBtu/hr.

7.4.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected boiler is subject to the following:

a. i. Emissions from the affected boiler shall not exceed the following limits:

| Pollutant | Emissions (Pounds/Hour) | (Tons/Year) |
|---|---|---|
| $NO_x$ | 0.45 | 1.68 |
| CO | 0.09 | 0.34 |

These limits are based on maximum firing rate, operating hours (7488 hr/yr), and standard emission factors for natural gas.

ii. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

iii. The above limitations were established in Permit 97040062, pursuant to PSD. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for PSD [T1].

7.4.7 Testing Requirements

Testing requirements are not set for the affected boiler. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.4.8 Monitoring Requirements

Monitoring requirements are not set for the affected boiler.

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected boiler to demonstrate compliance with Conditions 5.6.1 and 7.4.3 and 7.4.6, pursuant to Section 39.5(7)(b) of the Act:

a. i. Total natural gas usage for the affected boiler, mmscf/mo and mmscf/yr.

ii. Annual aggregate $NO_x$, PM, $SO_2$, and VOM emissions from the affected boiler, based on fuel consumption and the applicable emission factors.

iii. $NO_x$ and CO emissions with supporting calculations based from the record keeping required by this condition, tons/mo and tons/yr.

iv. The Permittee shall keep onsite records of the results of periodic inspections, routine maintenance, and repair of defects. Upon request, these documents shall be made available for inspection and copying by the Illinois EPA.

7.4.10 Reporting Requirements

a. Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected boiler with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

i. Emissions of PM, NOx, or CO from the affected boiler in excess of the limits specified in Conditions 7.4.3 and 7.4.6 within 30 days of such occurrence.

ii. Operation of the affected boiler in excess of the limits specified in Condition 7.4.5 within 30 days of such occurrence.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected boiler.

7.4.12 Compliance Procedures

a. Compliance with the PM emission limitations of Conditions 7.4.3(b) and (c)are addressed by the normal work practices and maintenance activities required in Condition 7.4.5(a) and the records required in Condition 7.4.9(a).

b. Compliance with the NOx and CO emission limitation of Condition 7.4.6(a) is addressed by the fuel records required in Condition 7.4.9(a) and emission calculations using the emission factor in USEPA's Compilation of Air Pollutant Emission Factors, AP-42, listed below, for uncontrolled CO emissions from a gas-fired boiler.

Emission factors for the affected boiler:

| Pollutant | Emission Factors ($lb/10^6$ $ft^3$) |
|---|---|
| $NO_x$ | 100 |
| CO | 84 |

The emission factors are for small natural gas fired boilers (< 100 mmBtu/hr) from AP-42 Section Tables 1.4-1 and 1.4-2, AP-42, Volume I, Fifth Edition (dated March 1998).

## 8.0 GENERAL PERMIT CONDITIONS

### 8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after _____ (the date of issuance of the proposed permit) unless this permit has been modified to reflect such new requirements.

### 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

### 8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

#### 8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

a. The changes do not violate applicable requirements;

b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test

methods), recordkeeping, reporting, or compliance certification requirements;

c. The changes do not constitute a modification under Title I of the CAA;

d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and

e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:

i. Describe the physical or operational change;

ii. Identify the schedule for implementing the physical or operational change;

iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;

iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and

v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Conditions 8.6.3 and 8.6.4.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA

every six months as follows, unless more frequent submittal of such reports is required in Sections 5 or 7 of this permit [Section 39.5(7)(f) of the Act]:

| Monitoring Period | Report Due Date |
|---|---|
| January - June | September 1 |
| July - December | March 1 |

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

a. The name and identification of the affected unit(s);

b. The person(s) who will be performing sampling and analysis and their experience with similar tests;

c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

d. The specific determinations of emissions and operation that are intended to be made, including sampling and monitoring locations;

e. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods;

f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The

test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

a. The name and identification of the affected unit(s);

b. The date and time of the sampling or measurements;

c. The date any analyses were performed;

d. The name of the company that performed the tests and/or analyses;

e. The test and analytical methodologies used;

f. The results of the tests including raw data, and/or analyses including sample calculations;

g. The operating conditions at the time of the sampling or measurements; and

h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

a. Unless otherwise specified in the particular provision of this permit or in the written instructions distributed by the Illinois EPA for particular reports, reports and notifications shall be sent to the Illinois EPA - Air Compliance Unit with a copy sent to the Illinois EPA - Air Regional Field Office.

b. As of the date of issuance of this permit, the addresses of the offices that should generally be utilized for the submittal of reports and notifications are as follows:

i. Illinois EPA - Air Compliance Unit

Illinois Environmental Protection Agency
Bureau of Air
Compliance & Enforcement Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Quality Planning Section

Illinois Environmental Protection Agency
Bureau of Air
Air Quality Planning Section (MC 39)
P.O. Box 19276
Springfield, Illinois 62794-9276

iii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

c. Permit applications should be addressed to the Air Permit Section. As of the date of issuance of this permit, the address of the Air Permit Section is as follows:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

8.7 Title I Conditions

Notwithstanding the expiration date on the first page of this CAAPP permit, Title I conditions in this permit, which are identified by a T1, T1N, or T1R designation, remain in effect until such time as the Illinois EPA takes action to revise or terminate them in accordance with applicable procedures for action on Title I conditions. This is because these conditions either: (a) incorporate conditions of earlier permits that were issued by the Illinois EPA pursuant to authority that includes authority found in Title I of the CAA (T1 conditions), (b) were newly established in this CAAPP permit pursuant to authority that includes such Title I authority (T1N conditions), or (c) reflect a revision or combination of conditions established in this CAAPP permit (T1R conditions). (See also Condition 1.5.)

## 9.0 STANDARD PERMIT CONDITIONS

### 9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule.

9.1.2 In particular, this permit does not alter or affect the following [Section 39.5(7)(j)(iv) of the Act]:

a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Section 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

### 9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless this permit provides for such continued operation consistent with the Act and applicable Illinois Pollution Control Board regulations [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated there under.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents as may be required by law and in accordance with constitutional limitations, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Sections 4 and 39.5(7)(a) and (p)(ii) of the Act]:

a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment),

practices, or operations regulated or required under this permit;

d. Sample or monitor any substances or parameters at any location:

i. At reasonable times, for the purposes of assuring permit compliance or applicable requirements; or

ii. As otherwise authorized by the CAA, or the Act.

e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and

f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any regulated activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].

b. Other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Air Quality Planning Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Unit, Air Regional Field Office, and USEPA Region 5 – Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

a. The certification shall include the identification of each term or condition of this permit that is the basis of the

certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.

c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act and applicable regulations [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as Attachment 1 to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence [Section 39.5(7)(k) of the Act]:

i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

Note: For this purpose, emergency means a situation arising from sudden and reasonably unforeseeable events beyond the control of the source, as further defined by Section 39.5(7)(k)(iv) of the Act.

ii. The permitted source was at the time being properly operated;

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed

description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations [Section 39.5(7)(k)(iv) of the Act].

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit.

b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program.

c. The Illinois EPA or USEPA determines that this permit contains a material mistake or that inaccurate statement were made in establishing the emission standards or limitations, or other terms or conditions of this permit.

d. The Illinois EPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation and reissuance under Section 39.5(15) of the Act, pursuant to Sections 39.5(5)(e) and (i) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of the permit, other portions of the permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of this CAAPP permit will remain in effect until the issuance of a renewal permit [Section 39.5(5)(l) and (o) of the Act].

Note: Pursuant to Sections 39.5(5)(h) and (n) of the Act, upon submittal of a timely and complete renewal application, the permitted source may continue to operate until final action is taken by the Illinois EPA on the renewal application, provided, however, that this protection shall cease if the applicant fails to submit any additional information necessary to evaluate or take final action on the renewal

application as requested by the Illinois EPA in writing. For a renewal application to be timely, it must be submitted no later than 9 months prior to the date of permit expiration.

9.15 General Authority for the Terms and Conditions of this Permit

The authority for terms and conditions of this permit that do not include a citation for their authority is Section 39.5(7)(a) of the Act, which provides that the Illinois EPA shall include such provisions in a CAAPP permit as are necessary to accomplish the purposes of the Act and to assure compliance with all applicable requirements. Section 39.5(7)(a) of the Act is also another basis of authority for terms and conditions of this permit that do include a specific citation for their authority.

Note: This condition is included in this permit pursuant to Section 39.5(7)(n) of the Act.

## 10.0 ATTACHMENTS

Attachment 1 Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

Attachment 2 Emissions of Particulate Matter from Process Emission Units

a. New Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].

i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

$$E = A(P)^B$$

where:

P = Process weight rate; and
E = Allowable emission rate; and,

A. Up to process weight rates of 408 Mg/hr (450 T/hr):

| | Metric | English |
|---|---|---|
| P | Mg/hr | T/hr |
| E | kg/hr | lb/hr |
| A | 1.214 | 2.54 |
| B | 0.534 | 0.534 |

B. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

| | Metric | English |
|---|---|---|
| P | Mg/hr | T/hr |
| E | kg/hr | lb/hr |
| A | 11.42 | 24.8 |
| B | 0.16 | 0.16 |

iii. Limits for Process Emission Units For Which Construction or Modification Commenced On or After April 19, 1972 [35 IAC 212.321(c)]:

| Metric | | English | |
|---|---|---|---|
| P | E | P | E |
| Mg/hr | kg/hr | T/hr | lb/hr |
| 0.05 | 0.25 | 0.05 | 0.55 |
| 0.1 | 0.29 | 0.10 | 0.77 |
| 0.2 | 0.42 | 0.2 | 1.10 |
| 0.3 | 0.64 | 0.30 | 1.35 |
| 0.4 | 0.74 | 0.40 | 1.58 |
| 0.5 | 0.84 | 0.50 | 1.75 |
| 0.7 | 1.00 | 0.75 | 2.40 |
| 0.9 | 1.15 | 1.00 | 2.60 |
| 1.8 | 1.66 | 2.00 | 3.70 |
| 2.7 | 2.1 | 3.00 | 4.60 |
| 3.6 | 2.4 | 4.00 | 5.35 |
| 4.5 | 2.7 | 5.00 | 6.00 |
| 9.0 | 3.9 | 10.00 | 8.70 |
| 13.0 | 4.8 | 15.00 | 10.80 |
| 18.0 | 5.7 | 20.00 | 12.50 |
| 23.0 | 6.5 | 25.00 | 14.00 |
| 27.0 | 7.1 | 30.00 | 15.60 |
| 32.0 | 7.7 | 35.00 | 17.00 |
| 36.0 | 8.2 | 40.00 | 18.20 |
| 41.0 | 8.8 | 45.00 | 19.20 |
| 45.0 | 9.3 | 50.00 | 20.50 |
| 90.0 | 13.4 | 100.00 | 29.50 |
| 140.0 | 17.0 | 150.00 | 37.00 |
| 180.0 | 19.4 | 200.00 | 43.00 |
| 230.0 | 22.0 | 250.00 | 48.50 |
| 270.0 | 24.0 | 300.00 | 53.00 |
| 320.0 | 26.0 | 350.00 | 58.00 |
| 360.0 | 28.0 | 400.00 | 62.00 |
| 408.0 | 30.1 | 450.00 | 66.00 |
| 454.0 | 30.4 | 500.00 | 67.00 |

b. Existing Process Emission Units for Which Construction or Modification Prior to April 14, 1972 [35 IAC 212.322].

i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].

ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.322(b)]:

$$E = C + A(P)^B$$

where:

P = Process weight rate; and
E = Allowable emission rate; and,

A. Up to process weight rates up to 27.2 Mg/hr (30 T/hr):

| | Metric | English |
|---|---|---|
| P | Mg/hr | T/hr |
| E | kg/hr | lb/hr |
| A | 1.985 | 4.10 |
| B | 0.67 | 0.67 |
| C | 0 | 0 |

B. For process weight rate in excess of 27.2 Mg/hr (30 T/hr):

| | Metric | English |
|---|---|---|
| P | Mg/hr | T/hr |
| E | kg/hr | lb/hr |
| A | 25.21 | 55.0 |
| B | 0.11 | 0.11 |
| C | - 18.4 | - 40.0 |

iii. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

| Metric P Mg/hr | E kg/hr | English P T/hr | E lb/hr |
|---|---|---|---|
| 0.05 | 0.27 | 0.05 | 0.55 |
| 0.1 | 0.42 | 0.10 | 0.87 |
| 0.2 | 0.68 | 0.2 | 1.40 |
| 0.3 | 0.89 | 0.30 | 1.83 |
| 0.4 | 1.07 | 0.40 | 2.22 |
| 0.5 | 1.25 | 0.50 | 2.58 |
| 0.7 | 1.56 | 0.75 | 3.38 |
| 0.9 | 1.85 | 1.00 | 4.10 |
| 1.8 | 2.9 | 2.00 | 6.52 |
| 2.7 | 3.9 | 3.00 | 8.56 |
| 3.6 | 4.7 | 4.00 | 10.40 |
| 4.5 | 5.4 | 5.00 | 12.00 |
| 9.0 | 8.7 | 10.00 | 19.20 |
| 13.0 | 11.1 | 15.00 | 25.20 |
| 18.0 | 13.8 | 20.00 | 30.50 |
| 23.0 | 16.2 | 25.00 | 35.40 |
| 27.2 | 18.15 | 30.00 | 40.00 |
| 32.0 | 18.8 | 35.00 | 41.30 |
| 36.0 | 19.3 | 40.00 | 42.50 |
| 41.0 | 19.8 | 45.00 | 43.60 |
| 45.0 | 20.2 | 50.00 | 44.60 |
| 90.0 | 23.2 | 100.00 | 51.20 |
| 140.0 | 25.3 | 150.00 | 55.40 |
| 180.0 | 26.5 | 200.00 | 58.60 |
| 230.0 | 27.7 | 250.00 | 61.00 |
| 270.0 | 28.5 | 300.00 | 63.10 |
| 320.0 | 29.4 | 350.00 | 64.90 |
| 360.0 | 30.0 | 400.00 | 66.20 |
| 400.0 | 30.6 | 450.00 | 67.70 |
| 454.0 | 31.3 | 500.00 | 69.00 |

Attachment 3 Compliance Assurance Monitoring (CAM) Plan

There are no specific emission units that require a CAM plan as identified in the Monitoring Requirements of Subsection 8 for each Section 7, Unit Specific Conditions for Specific Emission Units.

Attachment 4 Guidance

The Illinois has prepared guidance for sources on the Clean Air Act Permit Program (CAAPP) that is available on the Internet site maintained by the Illinois EPA, www.epa.state.il.us. This guidance includes instructions on applying for a revision or renewal of the CAAPP permit.

Guidance On Revising A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-revising.pdf

Guidance On Renewing A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-renewing.pdf

The application forms prepared by the Illinois EPA for the CAAPP are also available from the Illinois EPA's Internet site:

www.epa.state.il.us/air/caapp/index.html

These CAAPP application forms should also be used by a CAAPP source when it applies for a construction permit. For this purpose, the appropriate CAAPP application forms and other supporting information, should be accompanied by a completed Application For A Construction Permit form (199-CAAPP) and Fee Determination for Construction Permit Application form (197-FEE):

www.epa.state.il.us/air/caapp/199-caapp.pdf
www.epa.state.il.us/air/permits/197-fee.pdf

RWC:psj